

Exhibit D



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January 21, 2020

VIA EMAIL

Kristin N. Tahler, Esq.
Quinn Emanuel
865 South Figueroa Street
10th Floor
Los Angeles, CA 90017-2543

Re: Ex Parte Application of Gulf Investment Corporation Pursuant to 28 U.S.C. § 1782

Dear Ms. Tahler:

Thank you for your letter of January 9, 2020 and the attached draft confidentiality agreement that your client Gulf Investment Corporation ("GIC") would be prepared to execute. Our clients view the proffered draft as a well-received sign that GIC is interested in finding a path forward that avoids costly litigation for all parties. Our clients and we welcome the opportunity to discuss and negotiate the terms of a confidentiality agreement as the facts will prove that the allegations of wrongdoing in GIC's *Ex Parte* Application are completely unfounded. To that end, we stand by all of our statements in our December 30, 2019 letter to the Court.

As part of the process of clearing all confidentiality concerns in advance of such a discussion, we have reached out to Udenna Corporation ("Udenna"), the purchaser of the GGDC project in the Philippines, to obtain its input on what confidentiality terms, possibly including court-ordered confidentiality terms, would be acceptable. Our clients believe that given the allegations, Udenna should share the same interest in clearing the record provided that its financial information is sufficiently protected according to the terms of the Share Purchase Agreement. Once we obtain input from Udenna, including whether they want its legal counsel to participate in our discussions, we would like to schedule a meeting or telephone conference to discuss possible solutions and next steps.

If you have any questions, please feel free to contact me. We will keep you apprised of our progress with Udenna. If you wish to set a tentative date for a meeting early in February, please advise.

Sincerely,

A handwritten signature in black ink that reads "Sarah M. Gilbert".

Sarah M. Gilbert